

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X  
HONG LEONG FINANCE LIMITED  
(SINGAPORE),

Plaintiff,

-vs.-

MORGAN STANLEY; PINNACLE  
PERFORMANCE LIMITED; MORGAN  
STANLEY ASIA (SINGAPORE) PTE; MORGAN  
STANLEY & CO. INTERNATIONAL PLC;  
MORGAN STANLEY CAPITAL SERVICES LLC;  
MORGAN STANLEY & CO. LLC

Defendants.  
-----X

:  
: Case No.: 1:12-cv-06010-JMF-GWG

:  
: Related Case No.:  
: 1:10-cv-08086-JMF-GWG

**NOTICE OF DEFENDANTS' MOTION TO STAY DISCOVERY**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, the Declaration of Jonathan K. Youngwood executed April 12, 2013 and the exhibits attached thereto, and all of the prior papers and proceedings herein, Defendants Morgan Stanley, Pinnacle Performance Limited, Morgan Stanley Asia (Singapore) Pte, Morgan Stanley & Co. International plc, Morgan Stanley Capital Services LLC, and Morgan Stanley & Co. LLC (collectively "Defendants") will move before the Honorable Judge Gabriel W. Gorenstein, United States Magistrate Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be designated by the Court, for a protective order staying discovery pursuant to Rule 26(c) of the Federal Rules of Civil Procedure. Pursuant to this Court's briefing schedule, as set forth at the April 5, 2013 pre-trial conference, the opposition papers are due by April 19, 2013, and the reply papers are due by April 26, 2013.

Dated: New York, New York  
April 12, 2013

SIMPSON THACHER & BARTLETT LLP

BY:   
\_\_\_\_\_  
Bruce D. Angiolillo  
*bangiolillo@stblaw.com*  
Jonathan K. Youngwood  
*jyoungwood@stblaw.com*  
Andrew D. W. Cattell  
*acattell@stblaw.com*  
425 Lexington Avenue  
New York, New York 10017-3954  
Telephone: (212) 455-2000  
Facsimile: (212) 455-2502

*Attorneys for Defendants Morgan Stanley,  
Pinnacle Performance Limited, Morgan  
Stanley Asia (Singapore) Pte., Morgan  
Stanley & Co. International plc, Morgan  
Stanley Capital Services LLC, and Morgan  
Stanley & Co. LLC*